

EXHIBIT 13

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF DELAWARE

3 - - - - -

4 THOMSON REUTERS ENTERPRISE
5 CENTRE GMBH and WEST
6 PUBLISHING CORPORATION,

6 Plaintiffs, Case Number:

7 vs.

8 ROSS INTELLIGENCE, INC.,

9 Defendant.

10 - - - - -

13 Confidential Video Deposition of
14 LUTHER KARL BRANTING, Ph.D.
15 Wednesday, October 19, 2022
16 9:01 a.m.

23 Job No. 836111

24 Reported by: Laurie Donovan, RPR, CRR, CLR

25

1 A P P E A R A N C E S

2 ON BEHALF OF THE PLAINTIFF:

3 Kirkland & Ellis, LLP

4 601 Lexington Avenue

5 New York, New York 10022

6 (212)446-4989

7 By: Joshua L. Simmons, Esq.

8 joshua.simmons@kirkland.com

9 Eric Loverro, Esq.

10 eric.loverro@kirkland.com

11 ON BEHALF OF THE DEFENDANT:

12 Crowell & Moring LLP

13 Embarcadero Center, 26th Floor

14 San Francisco, California 94111

15 (415)986-2800

16 By: Warrington Parker, Esq.

17 wparker@crowell.com

18 ALSO PRESENT:

19 Jason Levin, videographer

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6 October 19, 2022

7 9:01 a.m.

9 Confidential Video Deposition of LUTHER
10 KARL BRANTING, held fully in-person, with the
11 witness and all parties participating
12 in-person, pursuant to the Rules of the
13 United States District Court for the District
14 of Delaware, subject to such stipulations as
15 may be recited herein or attached hereto,
16 before Laurie Donovan, a Registered
17 Professional Reporter and notary public of
18 the District of Columbia, who officiated in
19 administering the oath to the witness.

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8 E X H I B I T S

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11 Exhibit 2 Curriculum vitae for the

12 witness, Dr. Branting 24

13 Exhibit 3 The Springer Journal of Artificial

14 Intelligence and Law, article

15 written by the witness 62

16 Exhibit 4 Opening Expert Report by

17 Dr. Branting 84

18 Exhibit 5 Materials considered list 84

19 Exhibit 6 Handwritten notes from July 18,

20 2022 call with Mr. Ovbiagele . . . 90

21 Exhibit 7 Document titled "Intro to

22 AI @ ROSS," Bates-numbered

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11	others, dated December 12, 2017,	
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2 PROCEEDINGS

3 9:01 a.m.

4 -----

5 THE VIDEOGRAPHER: We are now on

6 the record. My name is Jason Levin, and I'm

7 the videographer retained by Lexitas.

8 Today's date is October 19, 2022, and the

9 time is 9:01 a.m.

10 This deposition is being held at

11 the offices of Kirkland & Ellis in

12 Washington, D.C., in the matter of Thomson

13 Reuters Enterprise Centre GmbH, et al, versus

14 ROSS Intelligence, Inc. The deponent is

15 Dr. Luther Karl Branting.

16 Would all counsel please identify

17 themselves for the record, and then the court

18 reporter, Laurie Donovan, will swear the

19 witness.

20 MR. SIMMONS: My name is Joshua

21 Simmons. With me is Eric Loverro. We're

22 from the law firm of Kirkland & Ellis, and we

23 represent the plaintiffs.

24 MR. PARKER: Warrington Parker

25 appearing on behalf of ROSS Intelligence.

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1 *****

2 Whereupon,

3 LUTHER KARL BRANTING, Ph.D.,

4 having been first duly sworn, testified

5 upon his oath as follows:

6 EXAMINATION BY COUNSEL FOR PLAINTIFFS

7 BY MR. SIMMONS:

8 **Q Would you please state your name for the**

9 **record.**

10 A My name is Luther Karl Branting.

11 **Q Are you currently employed?**

12 A Yes, I am.

13 **Q By whom?**

14 A The MITRE Corporation.

15 **Q And what is the MITRE Corporation?**

16 A It is a nonprofit trusted technical

17 advisor to the federal government.

18 **Q And what does MITRE advise the federal**

19 **government on? What subjects?**

20 A Well, sort of broadly, it's systems

21 engineering, but, but in a variety of different

22 technical areas primarily having to do with

23 computers.

24 **Q And what is your title at MITRE?**

25 A So my title is chief scientist machine

Page 10

[REDACTED]

Page 11

1 expertise, and actually I was recommended by a

2 friend of mine.

[REDACTED]

Page 12

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10/10/2014

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Response	Percentage
Yes, the U.S. should take action to address climate change	95%
No, the U.S. should not take action to address climate change	5%

[illegible]

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Age Group	Percentage of Respondents
18-29	90%
30-49	85%
50-64	80%
65+	60%

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Category	Value (approximate percentage)
1	45
2	35
3	95
4	100
5	100
6	80
7	85
8	82
9	95
10	98
11	100
12	100
13	48
14	25
15	90
16	80
17	20
18	95
19	100
20	85
21	80
22	85
23	85
24	80
25	100

Response	Percentage
Yes, the U.S. should take action to address climate change	95%
No, the U.S. should not take action to address climate change	5%

Category	Value (approximate percentage)
1	100
2	100
3	65
4	40
5	95
6	75
7	90
8	85
9	85
10	15
11	95
12	90
13	75
14	95
15	60
16	70
17	45
18	40
19	95
20	85
21	50
22	50
23	40
24	85
25	100
26	25

A horizontal bar chart consisting of 20 black bars of varying lengths. The bars are arranged in a single column. The lengths of the bars vary significantly, with the longest bar being the 10th bar from the top and the shortest bars being the 1st and 20th bars. The bars are all solid black and have no labels or titles.

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<div>Page 237</div> <div>[REDACTED]</div>	<div>[REDACTED]</div>
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<div>Page 269</div> <div>[REDACTED]</div>	<div>[REDACTED]</div>
<div>[REDACTED]</div>	<div>[REDACTED]</div>

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5 THE VIDEOGRAPHER: We're going off
6 the record at 4:35 p.m.
7 (Signature having not been
8 waived, the confidential video
9 deposition of LUTHER KARL BRANTING,
10 Ph.D. was concluded at 4:35 p.m.)
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6 ACKNOWLEDGEMENT OF WITNESS
7 I, Luther Karl Branting, Ph.D., do
8 hereby acknowledge that I have read and
9 examined the foregoing testimony, and the
10 same is a true, correct and complete
11 transcription of the testimony given by me,
12 and any corrections appear on the attached
13 Errata sheet signed by me.
14
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(DATE)

(SIGNATURE)

1 E R R A T A S H E E T

2 IN RE: THOMAS REUTERS VS. ROSS INTELLIGENCE

3 RETURN BY:

4 PAGE LINE CORRECTION AND REASON

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25 (DATE) (SIGNATURE)

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5 CERTIFICATE OF SHORTHAND REPORTER -- NOTARY PUBLIC

6 I, Laurie Donovan, Registered

7 Professional Reporter, Certified Realtime

8 Reporter, and notary public for the District

9 of Columbia, the officer before whom the

10 foregoing deposition was taken, do hereby

11 certify that the foregoing transcript is a

12 true and correct record of the testimony

13 given; that said testimony was taken by me

14 stenographically and thereafter reduced to

15 typewriting under my supervision; and that I

16 am neither counsel for, related to, nor

17 employed by any of the parties to this case

18 and have no interest, financial or otherwise,

19 in its outcome.

20

21 IN WITNESS WHEREOF, I have hereunto

22 set my hand and affixed my notarial seal this

23 31st day of October, 2022.

24

25 My commission expires: July 14, 2025

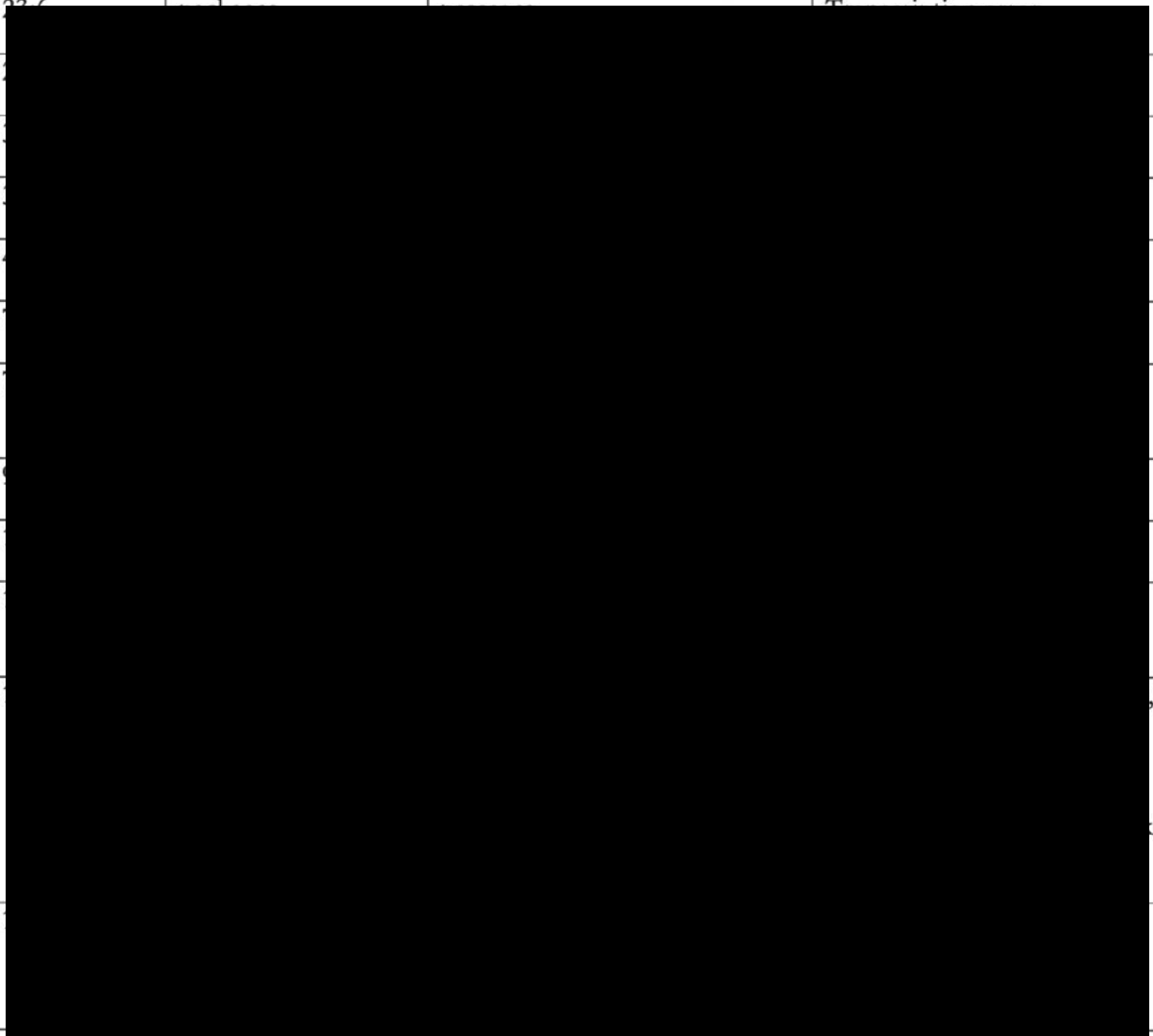
26

27 *Laurie Banger Donovan*

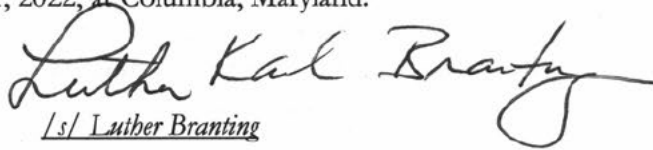
28 _____
 29 LAURIE DONOVAN
 30 NOTARY PUBLIC IN AND FOR
 31 THE DISTRICT OF COLUMBIA

Signature and Errata Sheet
October 19, 2022 Deposition of Luther Branting
Thomson Reuters Enterprise Centre GMBH and West Publishing Corporation v. ROSS Intelligence Inc.

I, Dr. Luther Branting, have reviewed the attached transcript of my October 19, 2022 deposition testimony and certify, pursuant 28 U.S.C. § 1746 that the attached transcript is my true and correct testimony during that deposition, subject to the corrections shown below.

Page/Line	Now Reads	Correction	Reason
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Executed on November 21, 2022, at Columbia, Maryland.


/s/ Luther Branting